## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re, Bankruptcy No. 19-17981-pmm ROGER KORNFEIND d/b/a Chapter 13 HYDRO DYNAMIC POOLS, LLC, Debtor, Document No. VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES, Movant, v. ROGER KORNFEIND, d/b/a HYDRO DYNAMIC POOLS, LLC, DEIDRE L. PATTERSON and SCOTT F. WATERMAN, Trustee, Respondents.

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

VW Credit Inc. d/b/a Audi Financial Services, has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay regarding the 2017 Audi Q7, VIN #WA1VAAF72HD003672.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **Tuesday**, **February 9**, **2021**, you or your attorney must do **all** of the following:
  - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court Eastern District of Pennsylvania The Gateway Building 201 Penn Street, Suite 103 Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Keri P. Ebeck, Esquire Bernstein-Burkley, P.C. 707 Grant Street Suite 2200, Gulf Tower Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **Tuesday, February 16, 2021**, at **10:00** A.M. in United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Suite 103, Reading, PA 19601
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Counsel for VW Credit Inc. d/b/a Audi Financial Services

Dated: January 26, 2021